

*Via Electronic Filing*

September 19, 2019

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth St., S.W.  
Washington, DC 20554

*Re: Promoting Telehealth for Low-Income Consumers – WC Docket No. 18-213*

Dear Ms. Dortch:

On September 17, 2019, Consumer Technology Association (“CTA”)<sup>1</sup> and certain member companies offering and developing telehealth and digital health solutions met with (1) Joseph Calascione, Legal Advisor to Commissioner Brendan Carr, and (2) members of the Commission’s Connect2HealthFCC Task Force. The purpose of the meetings was to discuss innovations and trends in the field and for CTA members to learn more about the Commission’s work in this area. The undersigned CTA staff; Latoya Thomas, Director of Policy and Government Affairs, Doctor on Demand; and Natalie Roisman of Wilkinson Barker Knauer, LLP, counsel to CTA, attended both meetings. In addition, Frances Ayalasomayajula, Head of Population Health, HP; Sarah Hess, Franklin Square Group, on behalf of Magic Leap; David Ryan, General Manager, Health & Life Sciences Business, Intel; Andrew Szente, Associate Director, Government Affairs, Best Buy; and Katie Wise, Invariant, on behalf of Ginger, attended the Task Force meeting. The following Task Force members participated in person or telephonically: Michele Ellison, Chair; Karen Onyeije, Chief of Staff; Ben Bartolome, Special Counsel; Dr. Chris Gibbons, Chief Health Innovation Officer; Dr. David Ahern, Special Advisor; and Arielle Mancuso, Special Advisor.

This letter summarizes the meetings and provides additional information regarding the ways in which consumer health and wellness technologies help to enhance consumers’ lives and health outcomes.

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<sup>1</sup> CTA represents more than 2,200 member companies – 80% are small businesses and startups; others are among the world’s best-known brands – who comprise the \$398 billion U.S. consumer technology industry. CTA also owns and produces CES®, the world’s gathering place for all who thrive on the business of consumer technologies.

The attendees meeting with Mr. Calascione stated that the consumer technology industry proudly enables and facilitates the current transformation in how healthcare is delivered, especially through the increasing deployment of the Internet of Things and new broadband technologies.<sup>2</sup> For example, advancing health technology can help aging consumer populations remain independent, improve health and wellness, and maintain quality of life.<sup>3</sup> The participants also discussed an August 29, 2019 letter, in which CTA joined over two dozen stakeholders spanning the healthcare and technology sectors, indicating strong support for the promise of connected health technologies and the goals of the Connected Care Notice of Proposed Rulemaking in the above-captioned docket.<sup>4</sup> Ms. Thomas provided Mr. Calascione an overview of the services offered by Doctor on Demand, and CTA staff discussed CES.

The CTA member companies meeting with the Task Force – Best Buy, Doctor on Demand, Ginger, HP, Intel, and Magic Leap – each explained how they are developing and deploying digital health and telehealth solutions. The participants explored the synergies between CTA members' work and the goal of the Task Force to get everyone connected to the people, services, and information they need to get well and stay healthy. In particular, the participants discussed the Task Force's work and private sector partnership opportunities relating to cancer care and opioid abuse. CTA distributed the attached presentation to the Task Force staff.

Finally, in the area of digital health, CTA notes that the association recently released an update to its ground-breaking *Guiding Principles for the Privacy of Personal Health and Wellness Information*.<sup>5</sup> The principles cover the collection, use, and sharing of data generated from personal health and wellness devices, apps, websites, and other digital tools.<sup>6</sup>

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<sup>2</sup> See Comments of the Consumer Technology Association, GN Docket No. 16-46 (May 24, 2017), [https://ecfsapi.fcc.gov/file/1052444490987/CTA\\_Broadband\\_Health\\_PN\\_Comments.pdf](https://ecfsapi.fcc.gov/file/1052444490987/CTA_Broadband_Health_PN_Comments.pdf).

<sup>3</sup> CTA's *Active Aging: Consumer Perceptions and Attitudes* study, published in January of this year, found that a significantly high percentage of seniors surveyed are readily willing to embrace advanced health monitoring technologies, remote health care, and everyday wellness solutions. CTA, *Active Aging Study*, (January 2019), <https://www.cta.tech/Research-Standards/Reports-Studies/Studies/2019/Active-Aging-Consumer-Perceptions-and-Attitudes.aspx>. These technologies, which can be further promoted by younger caregivers, aim to improve quality of life and increase senior independence in both emergency and everyday situations. *Id.* at 5. The CTA study finds that there is a significant amount of familiarity and willingness among seniors to adopt advancing health technology. *Id.* at 5-6.

<sup>4</sup> Comments of American Heart Association, et al., WC Docket No. 18-213 (Aug. 29, 2019), [https://ecfsapi.fcc.gov/file/1083060856024/Multistakeholder%20Ltr%20to%20FCC%20re%20Connected%20Care%20Pilot%20NPRM%20\(082919\)%20\(final%20with%20co-signers\).pdf](https://ecfsapi.fcc.gov/file/1083060856024/Multistakeholder%20Ltr%20to%20FCC%20re%20Connected%20Care%20Pilot%20NPRM%20(082919)%20(final%20with%20co-signers).pdf). CTA agrees that “[p]ilot projects should support use of innovative technologies, end-user devices, and software platforms.” Likewise, pilot projects “should use outcome-driven (technology neutral) requirements and metrics.”

<sup>5</sup> CTA, *Guiding Principles for the Privacy of Personal Health and Wellness Information*, (2019), <https://www.cta.tech/cta/media/Membership/PDFs/CTA-Guiding-Principles-for-the-Privacy-of-Personal-Health-and-Wellness-Information.pdf>.

<sup>6</sup> Press Release, CTA, CTA Releases Industry-Developed Privacy Guidelines on Health Data (Sept. 13, 2019), <https://cta.tech/News/Press-Releases/2019/September/CTA-Releases-Industry-Developed-Privacy-Guidelines.aspx>.

CTA and CTA members welcome the continued opportunity to engage and partner with the Commission as the agency seeks to increase the connectivity that enables connected care and explore the transformative benefits of broadband on the health care space.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let the undersigned know if you have any questions regarding this filing.

Respectfully submitted,

/s/ René Quashie

René Quashie

VP, Policy & Regulatory Affairs, Digital Health

Rachel S. Nemeth

Director, Regulatory Affairs

cc: Joseph Calascione  
Michele Ellison  
Karen Onyeije  
Ben Bartolome  
Dr. Chris Gibbons  
Dr. David Ahern  
Arielle Mancuso

Enclosure

Consumer  
Technology  
Association™



CTA.tech



# Who we are

- Trade association representing every facet of the consumer technology industry
- Founded in 1924
- Producer of CES
- Publish standards and research
- Our mission: to Grow the Consumer Tech Industry

# What we do

CTA provides practical resources for the technology industry



Market research



Networking and business development



Advocacy



Media support



Technology standards



Industry news and education





*CES 2019:*

***170,000+ attendees***

***4,000+ exhibitors***

***6,500 + media***

*Product categories:*

*3D Printing | Augmented & Virtual Reality |  
Audio | Digital Imaging/Photography | Drones |  
Electronic Gaming | **Health and Biotech** |  
Personal Privacy & Cyber Security | Robotics |  
Smart Home | Startups | Vehicle Technology |  
Wearables | and more!*

The world's **gathering**  
**place** for all who  
**thrive** on the **business**  
of consumer  
**technologies.**

# Health and Fitness Technology Division Board Members

- AppliedVR
- AT&T
- BestBuy Health
- Doctor on Demand
- Fitbit
- Ginger
- Google/Verily
- HP
- Humana
- Humetrix
- Intel
- Johnson & Johnson
- Microsoft
- Neurosky
- Omron
- Philips
- Samsung
- Valencell
- Validic
- Verizon
- Walgreens



# Health and Fitness Technology Division

This group strives to increase the use of technology enabled value-based health care to reduce health care costs and drive better health outcomes.

- Works with regulators and policy makers to ensure innovation in the health and fitness technology industry can thrive.
- Promotes the value of technology enabled value-based health care.
- Conducts market research in the health and fitness tech space.
- Collaborates with the medical community to increase adoption of health and wellness technology to achieve better health outcomes.
- Creates industry standards to enhance data validity and accuracy of health and fitness devices, apps and software.



# CTA Health and Fitness Tech Research

CTA's research shows that almost one in two health care professionals believe technology has made health and fitness more accessible to their patients and agree that patients are happy to share this data with them.

## Recently published health and fitness tech research from CTA:

- *Connected Health and Remote Patient Monitoring*
- *Active Aging: Consumer Perceptions and Attitudes*
- *Assessing the Landscape for Digital Therapeutics*
- *Consumer Usage and Trends of Technology for the Family Caregiver*
- *Wearable Health and Fitness Technology in U.S. Medical Care*
- *Consumer Journey to Purchase Health and Fitness Tech*
- *White Paper: Active Aging Report*
- *Consumer Awareness and Perceptions of Sleep Technologies*



February 2018

The Authoritative Source for Consumer Technologies Market Research  
research@CTA.tech | 703-907-7600

Consumer  
Technology  
Association

# Health and Fitness Tech Standards

CTA's standards focus on device accuracy, data validity and best practices for mobile medical apps

## CTA Health and Fitness Technology Standards

- ANSI/CTA-2056, *Physical Activity Monitoring for Fitness Wearables – Step Counting*
- ANSI/CTA-2065, *Physical Activity Monitoring for Heart Rate and Related Measures*
- ANSI/CTA/NSF-2052.1, *Glossary of Terms for Sleep Wearable Devices*
- ANSI/CTA/NSF-2052.2, *Methodology of Measurements for Features in Sleep Tracking Consumer Technology Devices and Applications*
- ANSI/CTA/NSF-2052.3, *Performance Criteria and Testing Protocols for Features in Sleep Tracking Consumer Technology Devices and Applications*
- ANSI/CTA-2068, *Definitions and Characteristics of Consumer Stress Monitoring Technologies*
- CTA-2073, *Guiding Principles of Practice and Transparency for Mobile Health Solutions* (In Progress)
- ANSI/CTA-2074, *Intensity Metrics: Physical Activity Monitoring* (In Progress)

# Artificial Intelligence

- [What is Artificial Intelligence?](#) - September 2018
  - A practical guide to understanding the definition, meaning and importance of cognitive technologies and their adoption in industry.
- [Use Case in Artificial Intelligence](#) – November 2018
  - Understanding the application of AI across a range of industries.
- Definitions and Characteristic of Artificial Intelligence (In Progress – Q3 2019)

# AI in Health Care Initiative

In 2019 CTA created a new Standards Working Group – AI in Health Care Work Group

- 98point6 Inc.
- **AdvaMed**
- **America's Health Insurance Plans**
- **American Medical Association**
- **American Telemedicine Association**
- AT&T Inc
- BlackBerry
- **Brookings Institution**
- CarePredict, Inc. (Co-Chair)
- **Connected Health Initiative**
- Doctor on Demand
- **Duke-Robert J. Margolis, MD, Center for Health Policy**
- **Federation of State Medical Boards**
- Fitbit, Inc.
- Google Inc.
- **HorizonDC**
- Humetrix
- IBM
- IDx Technologies Inc.
- Intel Corporation
- Isowalk
- LG Electronics
- Livongo Health
- Magic Leap, Inc.
- Mercedes Benz - A Daimler Brand
- MindMaze S.A.
- **National Urban League Washington Bureau**
- NeuroMetrix
- NeuroSky
- Osso VR
- Philips (Co-Chair)
- Reemo
- Samsung Electronics
- SDI Technologies, Inc.
- SHIFT Performance Global
- Valencell, Inc.
- Validic
- Verizon
- Volar Health, LLC
- VOXX International

# AI in Health Care Initiative

- Definitions/characteristics of AI in Health Care (In Progress - 2019)
- The Use of AI in Health Care: Trustworthiness (In Progress - 2019)
  - Artificial Intelligence (AI) is quickly becoming a pervasive tool in the health care industry. This standard explores the impact of the trustworthiness of AI in health care through the lens of the end user (e.g., physician, consumer, professional and family caregiver). Additionally, the standard will identify the unique challenges and opportunities for AI in the health care sector.
- Best practices for data stewardship for AI in Health Care (Roadmap – 2020)

# Other Initiatives

Privacy principles

Virtual care best practices

Heart rhythm white paper

Value based care paper

Health equities white paper



# Contact Info

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